

Exhibit 6D

5/14/2014 E-mail from S. Hackney to G. Irwin

From: Hackney, Stephen C.
Sent: Wednesday, May 14, 2014 8:14 AM
To: Geoffrey S Irwin
Subject: Re: Discovery proposal

Except on the art rogs, what I said was that the City needed to choose: either answer the rog or say it doesn't know the answer, which applies to most of them.

As to your document production, what I said is that I am not going to address that until we get this little deal done but that if we are able to do our deal, I would sit with you and identify the categories of documents where the date limitation is most problematic. So I don't think I will be in a position to say anything on that subject to Rhodes on Thursday.

Let me know what you guys want to do and if you are agreeable, when I can get your revised rogs so I know whether are arguing tomorrow.

Best,

Steve

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On May 14, 2014, at 12:14 AM, "Geoffrey S Irwin" <gsirwin@JonesDay.com> wrote:

That's right. We would respond to the non-art rogs on the more narrowed terms you proposed and stand down on the ones related to art. I think the real benefit to us would be on the search though, so what might make sense would be to put it to Rhodes like that at the beginning. Say something like the City and Syncora think they've found a way to limit some issues from Monday but for the City it depends on a resolution to the 2012 search and need guidance from the court based on where we left things. If we were in agreement as to approach and Rhodes relieves us of the ESI search first, rest of deal would follow from there.

Haven't heard from my guys yet, but that's how I would envision it. Thoughts?

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